UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION

MDL No. 2875

THIS DOCUMENT RELATES TO ALL CASES

HON. RENÉE MARIE BUMB

PLAINTIFFS' NOTICE OF MOTION TO ESTABLISH COMMON BENEFIT ASSESSMENTS AND COMMON BENEFIT FUND

TO: All Counsel

PLEASE TAKE NOTICE that on February 18, 2025, Plaintiffs shall move before the Honorable Renée Marie Bumb, at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4th and Cooper Streets, Camden, New Jersey, for an Order to Establish Common Benefit Assessments and Common Benefit Fund.

PLEASE TAKE FURTHER NOTICE that Plaintiffs shall rely upon the Brief and Certification of Adam M. Slater in support of the Motion. A proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Plaintiffs request oral argument pursuant to L. Civ. R. 78.1.

MAZIE SLATER KATZ & FREEMAN, LLC Attorneys for Plaintiffs

By:	/s/ Adam M. Slater	
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Dated: January 15, 2025

CERTIFICATE OF SERVICE

I hereby certify that on January 15, 2025, I electronically filed the foregoing documents with the Clerk of the Court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

MAZIE SLATER KATZ & FREEMAN, LLC Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: January 15, 2025